IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JENNIFER LYNN LAWRENCE,

DOAR, INC.,

,

Plaintiff,

Civil Action No.: 2:21-cv-03269

V.

Defendant. :

DEFENDANT'S MOTION FOR LEAVE TO FILE REPLY IN SUPPORT OF ITS MOTION TO DISMISS

Defendant DOAR, Inc., by and through its undersigned attorney, hereby moves for leave to file a Reply in further support of its Motion to Dismiss Complaint for Lack of Personal Jurisdiction, Improper Venue, and Failure to State a Claim (Dkt. 8). In support of this Motion, DOAR states as follows:

- 1. On September 28, 2021, Defendant filed its Motion to Dismiss.
- 2. On October 11, 2021, Plaintiff Jennifer Lynn Lawrence filed her Response in Opposition to Defendant's Motion to Dismiss (the "Opposition," Dkt. 9).
- 3. Plaintiff's Opposition makes several misstatements of law. Defendant seeks to correct those misstatements and respond to other legal issues raised in the Opposition.
- 4. Accordingly, DOAR respectfully seeks leave to file a seven-page Reply in further support of its Motion to Dismiss, which is attached hereto as Exhibit 1 (the "Reply"). The Reply does not raise any new issues, and only responds to arguments made in Plaintiff's Opposition.

WHEREFORE, Defendant respectfully requests that the Court enter an order granting its Motion for leave to file its Reply.

Dated: October 22, 2021 Respectfully submitted,

BALLARD SPAHR LLP

By: /s/ Elizabeth Seidlin-Bernstein

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